

# MINTZ LEVIN

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November 8, 2013

**VIA ECF**

Honorable Andrew J. Peck  
Southern District of New York  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Re:** *GPIF-I Equity Co., Ltd., et al. v. HDG Mansur Investment Services, Inc., et al.*,  
Case No. 13 Civ. 547 (CM)

Dear Judge Peck:

On behalf of the Defendants in the above-captioned action, we write as a follow-up to our November 1, 2013 discovery conference in which the Court ordered the parties to engage in good faith discussions to resolve their outstanding disputes regarding their privilege logs. Per the Court's request, the parties had a series of good-faith conversations this week and were able to resolve successfully all outstanding issues but one: whether Jeffrey Haroldson's communications with Plaintiffs can be withheld on privilege grounds from Defendants during the time period in which both parties contemporaneously recognized he was employed by Defendants (and during which Plaintiffs will contend he provided legal services to Plaintiffs).

We respectfully request guidance from the Court with respect to how to proceed and would like to resolve this issue using whichever procedure that the Court prefers (i.e., brief teleconference, submission of a short letter with each party limited to two pages, etc.). We very much appreciate the Court's assistance with this matter.

Respectfully,

  
Francis J. Earley

cc: All Counsel of Record (via ECF)

**Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.**

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